The Honorable Marsha J. Pechman

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UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON

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YOLANY PADILLA, on behalf of herself and her 6-year-old son J.A.; IBIS GUZMAN, on behalf of herself and her 5-year-old son R.G.; BLANCA ORANTES, on behalf of herself and her 8-year-old son A.M.; **BALTAZAR** VASQUEZ, on behalf of himself;

Plaintiffs-Petitioners.

v.

U.S. IMMIGRATION AND CUSTOMS ENFORCEMENT ("ICE"); OF U.S. DEPARTMENT **HOMELAND** SECURITY ("DHS"); U.S. CUSTOMS AND BORDER PROTECTION ("CBP"); U.S. CITIZENSHIP IMMIGRATION SERVICES ("USCIS"); EXECUTIVE OFFICE FOR IMMIGRATION REVIEW ("EOIR"); THOMAS HOMAN, Acting Director of ICE; KIRSTJEN NIELSEN, Secretary of DHS; KEVIN K. McALEENAN, Acting Commissioner of CBP; L. FRANCIS CISSNA, Director of USCIS; MARC J. MOORE, Seattle Field Office Director, ICE, **JEFFERSON BEAUREGARD** SESSIONS III, United States Attorney General; LOWELL CLARK, warden of the Northwest Detention Center in Tacoma, Washington; CHARLES INGRAM, warden of the Federal Detention Center in SeaTac, Washington; DAVID SHINN, warden of the Federal Correctional Institute in Victorville, California; JAMES JANECKA, warden of the Adelanto Detention Facility;

No. 2:18-cv-928 MJP

JOINT STIPULATION AND [PROPOSED] **ORDER REGARDING MOTION FOR PRELIMINARY** INJUNCTION BRIEFING **SCHEDULE**

NOTE ON MOTION CALENDAR: OCTOBER 1, 2018.

Defendants-Respondents.

Pursuant to Local Civil Rules 7(d)(1) and 10(g), Plaintiffs and Defendants hereby stipulate and jointly move the Court for an Order revising the schedule for the filing of Defendants' response in opposition to Plaintiffs' motion for preliminary injunction, and Plaintiffs' reply in support of their motion.

Currently Defendants' response to Plaintiffs' motion for preliminary injunction is due October 8, 2018, which is the Columbus Day holiday, and Plaintiffs' reply is October 12, 2018.

JOINT STIPULATION AND [PROPOSED] ORDER REGARDING MOTION FOR PRELIMINARY INJUNCTION BRIEFING SCHEDULE - 1 CASE No. 2:18-cv-928 MJP

U.S. Department of Justice, Civil Division Office of Immigration Litigation, District Court Section PO Box 868, Ben Franklin Station Washington, DC 20044 Telephone (202) 616-4458

1	After consultation between the parties' counsel, the parties stipulate to an extension until October	
2	17, 2018, for Defendants to file their response to Plaintiffs' motion, and an extension until October	
3	26, 2018, for Plaintiffs' to file their reply in support of their motion. Plaintiffs will re-note their	
4	motion for October 26, 2018.	
5	The reason for this stipulation is to allow both sides sufficient time to brief these important	
6	issues thoroughly for the Court. This requested extension will not impact any other deadlines in	
7	the case.	
8	RESPECTFULLY SUBMITTED this 1st day of October, 2018.	
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10	s/ Matt Adams	Kristin Macleod-Ball*
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16	NORTHWEST IMMIGRANT RIGHTS PROJECT	*Admitted pro hac vice
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	JOINT STIPULATION AND [PROPOSED] ORDER REGARDING MOTION FOR PRELIMINARY INJUNCTION BRIEFING SCHEDULE - 2	U.S. Department of Justice, Civil Division Office of Immigration Litigation, District Court Section PO Box 868, Ben Franklin Station Washington, DC 20044

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1 [PROPOSED] ORDER 2 Based on the foregoing stipulation of the parties, IT IS SO ORDERED. Defendants' 3 response to Plaintiffs' motion for preliminary injunction will be due October 17, 2018. Plaintiffs' 4 reply to their motion for preliminary injunction will be due October 26, 2018, and their motion 5 will be noted for that date. 6 7 DATED this _____, 2018. 8 9 10 THE HONORABLE MARSHA J. PECHMAN 11 UNITED STATES DISTRICT JUDGE 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26

JOINT STIPULATION AND [PROPOSED] ORDER REGARDING MOTION FOR PRELIMINARY INJUNCTION BRIEFING SCHEDULE - 3 CASE No. 2:18-cv-928 MJP U.S. Department of Justice, Civil Division Office of Immigration Litigation, District Court Section PO Box 868, Ben Franklin Station Washington, DC 20044 Telephone (202) 616-4458

CERTIFICATE OF SERVICE

I hereby certify that on October 1, 2018, I had the foregoing electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to those attorneys of record registered on the CM/ECF system. All other parties (if any) shall be served in accordance with the Federal Rules of Civil Procedure.

/s/ Lauren C. Bingham
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JOINT STIPULATION AND [PROPOSED] ORDER REGARDING MOTION FOR PRELIMINARY INJUNCTION BRIEFING SCHEDULE - 4 CASE No. 2:18-cv-928 MJP U.S. Department of Justice, Civil Division Office of Immigration Litigation, District Court Section PO Box 868, Ben Franklin Station Washington, DC 20044 Telephone (202) 616-4458